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 SERENDIP LLC and WENDY CARLOS

**UNITED STATES DISTRICT COURT
 FOR THE CENTRAL DISTRICT OF CALIFORNIA**

SERENDIP LLC & WENDY
 CARLOS,

Plaintiff,

v.

WARNER BROS. ENTERTAINMENT
 INC.,

Defendant.

AND RELATED COUNTERCLAIMS,

Case No. CV 08-7739 RGK (RCx)

**STIPULATION FOR DISMISSAL
 WITH PREJUDICE AND
 RESERVATION OF
 JURISDICTION TO ENFORCE
 SETTLEMENT AGREEMENT**

[F.R.C.P. 41(a)(1)(A)(ii)]

**[PROPOSED] ORDER FILED
 CONCURRENTLY HEREWITH**

The Honorable R. Gary Klausner

Trial Date: January 19, 2010

1 This Stipulation is entered into by and among Plaintiffs and
2 Counterdefendants Serendip LLC and Wendy Carlos (collectively, "Plaintiffs") and
3 Defendant and Counterclaimant Warner Bros. Entertainment Inc. ("Warner Bros.")
4 by and through their respective counsel of record:

5 WHEREAS Plaintiffs filed their Amended Complaint in this Action on or
6 about December 8, 2008;

7 WHEREAS Warner Bros. filed its First Amended Counterclaim against
8 Plaintiffs on or about April 9, 2009;

9 WHEREAS Plaintiffs and Warner Bros. have entered into a Settlement
10 Agreement that provides for dismissal with prejudice of the above-entitled action
11 (the "Action") in exchange for good and valuable consideration;

12 WHEREAS the Settlement Agreement has been executed by all Parties;

13 WHEREAS the Parties anticipate that they will complete performance under
14 the Settlement Agreement within twenty-one (21) days of the date of this
15 Stipulation;

16 WHEREAS the Settlement Agreement provides that all Parties are to bear
17 their own attorneys fees and costs;

18 WHEREAS trial in this Action is currently scheduled for January 19, 2010 at
19 9:00 am;

20 WHEREAS in light of the upcoming trial, the Parties agreed that the Action
21 should be dismissed with prejudice; and

22 WHEREAS the Parties desire that the Court retain jurisdiction to enforce the
23 Settlement Agreement after the Action has otherwise been dismissed.

24 NOW, THEREFORE, pursuant to Federal Rule of Civil Procedure
25 41(a)(1)(A)(ii), the Parties hereby stipulate and agree as follows:
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